

41018

STATE OF ALABAMA
BALDWIN COUNTY

§
§

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You are hereby commanded to summon Bessie Hayes to appear and answer, plead or demur, within thirty days from the service of this writ, to a Bill of Complaint filed against her in the Circuit Court, at Law, for said County and State by S. T. Tallent, and at the same time and place you are to make return of your actions hereunder.

Given under my hand and seal this the 22 day of October, 1959.

Alice J. Duck
CLERK OF COURT

EX 10-23-59 -----

S. T. TALLENT,
Plaintiff
vs.

§
§
§

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
AT LAW

BESSIE HAYES,
Defendant

§

COUNT ONE:

The Plaintiff claims of the Defendant the sum of \$688.87, due by her by promissory note made by her on, to-wit: January 24, 1958, which sum of money, with interest thereon, is still due and unpaid; and Plaintiff avers that in and by the terms of said note, Defendant waived all rights of exemption under the laws of the State of Alabama; and the Plaintiff claims of the Defendant the additional sum of \$120.00 as attorney's fees for bringing this suit for that the Defendant in and by the terms of said note agreed to pay a reasonable attorney's fee for the bringing and prosecuting of this suit.

Lawrence B. Smith
SOLICITOR FOR PLAINTIFF

FILED
10-22 1959
ALICE J. DUCK, CLERK
REGISTER

FILED
OCT 22 1959
ALICE DUCK, CLERK
REGISTER

Defendant can be located
at Daphne, Alabama

SUMMONS AND COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW

S. T. TALLENT,
PLAINTIFF
VS.
BESSIE HAYES,
DEFENDANT

Received 22 day of Oct 1959
and on 23 day of Oct 1959
I served a copy of the within Q & C
on Bessie Hayes
By service on _____

TAYLOR WILKINS, Sheriff
By Edleigh Shahan D.

Sheriff claims 54 miles at
Ten Cents per mile Total \$ 5.40
TAYLOR WILKINS, Sheriff
BY Edleigh Shahan
DEPUTY SHERIFF

Daphne, Ala

S. T. TALLENT,
Plaintiff,
vs.
BESSIE HAYES,
Defendant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

AT LAW.

4018

DEMURRERS TO PLAINTIFF'S COMPLAINT

Comes the Defendant in the above styled cause and demurs to the Complaint, and separately and severally to the one count thereof, and for grounds of demurrer, assigns, separately and severally, the following:

1. The said Count One does not state a cause of action.
2. It is not alleged when the said promissory note became due and payable.
3. It is not alleged with certainty the amount of interest due.
4. It is not alleged with certainty the amount of the rate of interest charged.
5. It is not alleged in said Count One the exact amount of the said promissory note alleged to be due.
6. The Complaint does not state a cause of action.

FILED

NOV 20 1959

FILED L. DUCK, CLERK

Kenneth Cooper
Attorney for Defendant

CASE NO. 14018

S. T. TALLENT,
Plaintiff,
Vs.
BESSIE HAYES,
Defendant.

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IN THE CIRCUIT COURT OF  
BALDWIN COUNTY, ALABAMA  
AT LAW

(XXXXXXXXXXXXXXXXXXXXXXXXXXXX)

DEMURRER TO  
PLAINTIFF'S COMPLAINT

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FILED

NOV 20 1959

WILL DUCK, CLERK  
REGISTER

101

3862

TO THE HONORABLE THE JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA: I, the undersigned, being duly sworn, depose and say that the within complaint is true and correct to the best of my knowledge and belief, and I am not aware of any facts which would render the same false or misleading. I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of November, 1959. S. T. TALLENT, Plaintiff. BESSIE HAYES, Defendant.

DEPOSED AT  
BALDWIN COUNTY, ALABAMA  
ON NOV 20 1959  
BY ME  
WILL DUCK, CLERK  
REGISTER

HEADQUARTERS FOR AUTOMOTIVE SUPPLIES



 **Fullwell Motor Products Co.**

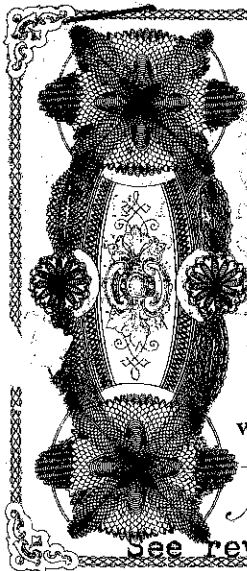
CLEVELAND, OHIO

OAKLAND, CALIF. DALLAS, TEXAS

ATLANTA, GEORGIA

**DOUG ARMSTRONG**  
GR 7-5893

2073 NAVCO ROAD  
MOBILE, ALABAMA



\$ 788.87

January 24

1958

I, after date Jan 24 I promise to  
pay to the order of Mr. or Mrs. S. T. Tallent

Seven Hundred Eighty Eight and 87/100 Dollars

Negotiable and payable at the residence of S. T. Tallent

for value received with interest from date at the rate of Six (6%) per cen

The right of exemption is hereby waived as provided in Constitution and Laws of the State of Alabama, and in any other  
State in the United States, and it is further agreed that the undersigned shall pay all costs of collection, including a reason-  
able attorney's fee if not paid at maturity.

WITNESS

James M. Bailey

Bessie Hayes (L.S.)

No. Due 19

(L.S.)

See reverse side for Payment Plan

In monthly installments of \$25.00 each, including interest at the rate of Six per cent (6%) per annum on the said principal sum of \$788.87, the first of such installments to be due and payable thirty days from the date of these presents and a like or similar installment on the same day of each successive month thereafter until entire principal and interest are fully paid; said installments to be applied first to interest then due and the balance, if any, to be applied on the principal.